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10 Attorneys for Defendant, American Airlines, Inc.

11  
12 UNITED STATES DISTRICT COURT

13 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION  
14

15 KATHLEEN HANNI, individually and on  
behalf of all others similarly situated,

16 Plaintiff,

17 vs.

18 AMERICAN AIRLINES, INC., and DOES 1  
19 through 20, inclusive,

20 Defendants.  
21

CASE NO. C08-00732 CW

**DECLARATION OF MICHAEL POWELL  
IN SUPPORT OF DEFENDANT  
AMERICAN AIRLINES, INC'S REPLY  
MEMORANDUM IN SUPPORT OF  
MOTION FOR LEAVE TO FILE  
AMENDED NOTICE OF REMOVAL**

Date: April 24, 2008

Time: 2:00 p.m.

Courtroom: 2, 4<sup>th</sup> Floor

22 I, Michael V. Powell, hereby declare:  
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24 1. I am a partner with the law firm of Locke Lord Bissell & Liddell located at 2200  
25 Ross Avenue, Suite 2200, Dallas, Texas 75201 and am counsel of record for American Airlines,  
26 Inc. ("American") in this action. I have personal knowledge of the matters set forth in this  
27 declaration, except for those facts that are alleged on information and belief, and as to those facts,  
28 I believe them to be true. I could and would testify competently thereto if called as a witness.

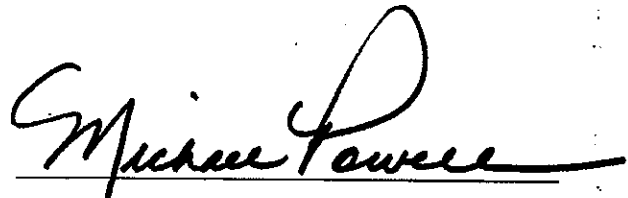
1           2.       On March 3, 2008 I received a call from Mr. Hudson. I had a very brief  
2 conversation with Mr. Hudson in which he informed me that he was about to send me a settlement  
3 demand letter ("Settlement Demand"). Nothing else was discussed during that call.

4           3.       At no time during my brief call with Mr. Hudson did he inform me that the  
5 Settlement Demand he was sending me was in furtherance of any ADR process mandated by this  
6 Court nor did he seek my agreement that the unsolicited Settlement Demand would be kept  
7 confidential.

8           4.       Counsel for American have not yet engaged in any discussions with Mr. Hudson  
9 (or Mr. Ramos) about an ADR process, nor has American affirmatively solicited any settlement  
10 demands from plaintiff's counsel.

11           I declare under penalty of perjury under the laws of the United States of America that the  
12 foregoing is true and correct, and that this declaration was executed on April 9, 2008 in Dallas,  
13 Texas.

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Michael V. Powell